

Saxton, Craig

From: Ed Squires [ed@hydrologicinc.net]
Sent: Monday, August 09, 2010 12:36 PM
To: Saxton, Craig
Subject: 8-9-2010 RE: Field Exam for 63-12552 - City of Kuna Danskin Wells

Importance: High

Hydro Logic, Inc.

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Dear Craig,

First of all, no need to apologize Craig, and thank you for working on this Permit.

You are correct that the initial "non-contiguous" water system was originally filed upon by United Water Idaho when it was in an expansion mode to enlarge its presence down valley. The two well sources were used only for the "closed system" of the two subdivisions you cited by the water right for a time while those subdivisions were developing. However, when the City of Kuna acquired ther wells and the water right, both wells were immediately interconnected to the City of Kuna water distribution system and have been used that way since.

This was one of the first non-contiguous water systems constructed by UWID (a new concept) and the issue of service area was raised by Steve Lester at the initial Permitting of the water right. The information exchange in the record, and the conditions of the approved Permit do indicate that that the right would serve the two subdivisions initially but that the ultimate goal was to serve UWID's service area (an expanding municipal water service area of unspecified areal extent) that would include other areas surrounding the initial two subdivisions). In 2007, while the water right was still under development, a "service area" issue came up between the City of Kuna and UWID with the resolution that that City would incorporate those subdivisions and the surrounding areas into its water service area and that it would acquire the wells and the water right from UWID. I assumed that the Permit, after being taken over by the City of Kuna, and incorporated into its expanding municipal service area, would have the same conditions and not be limited to the two original subdivisions. Condition No. 8 of the approved Permit states:

" The place of use is located near Kuna within the non-contiguous service area of United Water Idaho. Initial [emphasis added] development under this right will be for the Danskin Estates and Saddle Ridge Subdivisions."

In addition, a Memorandum from Gary Spackman, then IDWR Western Regional Manager, dated February 29, 2000 included the following two recommendations:

1. *The place of use is located within the non-contiguous service area of United Water Idaho near Kuna, Idaho. At the time of permitting [emphasis added], the place of use describes the platted subdivisions of Danskin Estates and the Saddle Ridge Subdivisions.*
2. *The Place of Use of this water right may be increased to provide water to all the non-contiguous service area of United Water Idaho, located near Kuna, Idaho, that serves the Danskin Estates and Saddle Ridge Subdivisions with an integrated system."*

Because of: 1) the discussions of the place of use in the water right back-file, 2) Gary Spackman's February 29, 2000 Memo, and 3) my interpretation of Condition No. 8. of the water right Permit, I did not recommend that the Permit be amended, or a new water right filed, to change or redefine the Place of Use of Water Right No. 63-12552.

The two "Danskin" wells (named Well #7 and Well #8) in question are interconnected to the City's system and can divert water throughout the City. Indeed, when Well #4 produced ground water with elevated concentrations of dissolved arsenic, the Danskin wells pretty much carried the demand while we dealt with that problem. Water from this POD is used continuously all winter and nearly continuously during summer to maintain system pressures in the larger water mains of the NE side of town.

My sense is that the original use was within the two cited subdivisions but, before those uses were fully developed, the City acquired the water right and brought it into full use within its service area; the two subdivisions are not yet fully developed. This situation is not at all uncommon in municipal systems because of the high cost of water main extensions compared to the cost of wells. In other words, I have seen many municipal systems install wells to supply an individual area until the new well can be interconnected with a water main (to the main distribution system) after a critical mass of population warrants the more costly water main.

I hope this explanation helps but feel free to call me with any other questions and thank you again for working on the City's Permits because it wants to file a comprehensive transfer application while the Department is focusing on transfers.

Respectfully,

Ed Squires

From: Saxton, Craig [mailto:Craig.Saxton@idwr.idaho.gov]
Sent: Monday, August 09, 2010 10:13 AM
To: Ed Squires
Subject: Field Exam for 63-12552 - City of Kuna

Good Morning Ed,

I am sorry it has taken us so long to get to you on this City of Kuna beneficial use field exam you submitted to IDWR in March. None-the-less, I am looking at it now. I did have one quick question for you.

Just to refresh, this permit was originally filed by United Water for a place of use described as the "...non-contiguous service area of United Water Idaho". More specifically, the Danskin Estates and Saddle Ridge Subdivisions was called out as the place of use (see attached Map).

In short, what I am wondering is if this permit describes a closed system that can only be served by the two wells, or if now that this is owned by the City of Kuna, the delivery system is integrated and can be co-mingled with other City of Kuna water rights?

On the beneficial Use Field Report, under Item B(1) where it asks if other water rights use the same place of use, you said "The City of Kuna's integrated portfolio of municipal water rights." In addition, you recommend the POU be described as the City of Kuna's Water Delivery Service Area. It sounds to me like these two wells are integrated into the City of Kuna's delivery system and water from the wells can be delivered to places other than just Danskin Estates and Saddle Ridge Subdivision.

If it is integrated into the City of Kuna's delivery system, was it ever functioning as a closed system? In other words, was it developed and used as a closed system when United Water held the right and then incorporated into the City of Kuna's system after ownership changed?

Any information you could provide would be great.

Thanks,
Craig Saxton

